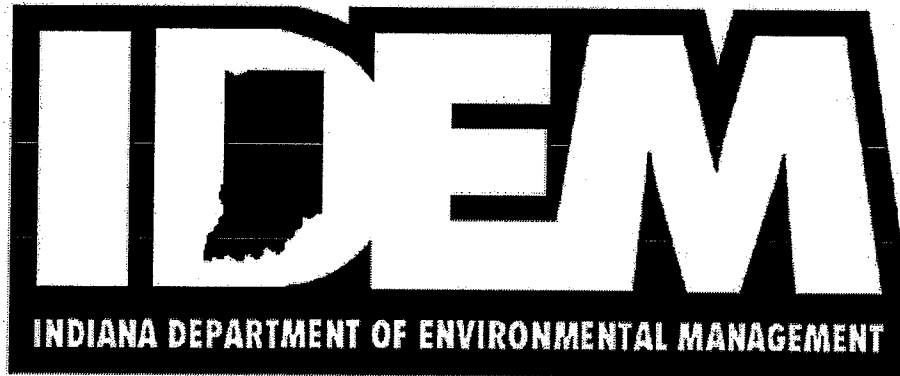


# Office of Air Quality

## Report to the Air Pollution Control Board on Air Permitting Programs

as required by 326 IAC 2-7-19, 326 IAC 2-1.1-8 and IC 13-17-13-3



**October 19, 2006**

for permit activity during the State Fiscal Year 2006 (FY06):

***July 1, 2005 - June 30, 2006***

# Report to the Air Pollution Control Board on Air Permitting Programs

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## **Introduction to Consolidated Air Board Report on Permitting**

The Indiana Department of Environmental Management's permitting programs are crucial to the successful implementation of Indiana's pollution control laws. Those affected by these programs - the regulated community, the general public, state and local officials, and the staff at the Indiana Department of Environmental Management (IDEM) - are interested in how these programs are implemented. The IDEM has been very active in providing information on the department's progress in improving the implementation of the various permit programs. In addition to supplying information requested by various groups, the Office of Air Quality (OAQ) reports annually to the Air Pollution Control Board as required by state law.

Three provisions in the state law 326 IAC 2-7-19 regarding the permit programs that implement Title V of the federal Clean Air Act; 326 IAC 2-1.1-8 on permit decisions subject to timeliness deadlines; and IC 13-17-13-3 regarding the streamlined Enforceable Operating Agreements require the OAQ to report on various aspects of our air permit program. Originally, the required information was presented in one report with three sections, with a separate section for Title V, NSR and Enforceable Operating Agreements. Beginning with the report for 1999, the reports have been integrated into one report that contains all the information required by the three different provisions of state law. In addition, the report also contains additional information that is not required by the underlying legal provisions, but is relevant to the implementation of the programs. This report covers the State Fiscal Year 2006, which began July 1, 2005 and ended June 30, 2006.

The public and interested parties can obtain more information regarding OAQ's construction and operating permit programs via the IDEM website:

[www.IN.gov/idem/permits/air](http://www.IN.gov/idem/permits/air). Information on this site includes:

- a link to IDEM's online permit guide, and
- Air Quality Permits Status Search, offering an opportunity to check on the status of permit applications and view and download draft and final permit documents using "real time" data.

## Background and Overview

Historically, the Air Permits Branch was responsible for implementing Indiana's **New Source Review Program** (also called Construction Permits), which permitted new sources and modifications to existing sources. This program had several levels of approvals, based on emissions.

In 1996, the Branch began implementing the Operating Permit programs that resulted from Title V of the 1990 Clean Air Act Amendments, known as the **Title V Operating Permit Program**. The U.S. EPA granted interim approval for Indiana's Title V operating permit program on December 14, 1995, and OAQ obtained full EPA approval of the program December 4, 2001. This new program has enabled the Agency to draft a compliance tool (the Title V permit) for the permittee, the Agency, and the public that serves as a single reference for all air pollution related requirements applicable to the permitted source. As a result, the OAQ has been reviewing, standardizing, and updating air operating permits for all significant point sources of air pollution in our state. Compliance rates will increase and emissions to the air will decrease as a result of the permits focus on monitoring environmentally significant operations.

Since 1990, the OAQ has worked with interested parties to develop relevant legislation, rules, applications, and model permits that will be used to implement Indiana's air operating permit programs. Approximately 1700 sources were affected by these programs in 1990. As new sources have been built, and others have closed, that number has grown to approximately 2000. Almost 700 of these sources, predominantly major source sources of air pollution, have already obtained or will be obtaining the permits specifically described by Title V of the Clean Air Act. Sources that would otherwise be required to obtain these Title V permits are covered by permit programs that are specially designed for smaller sources. These programs - Federally Enforceable State Operating Permits (FESOP), Source Specific Operating Agreements, (SSOA) and Permits by Rule - establish limits on a source's potential to emit air pollution to below Title V applicability thresholds. These programs achieve the most practical benefits of the full Title V program with streamlined procedures and lower fees. Title V requires that the direct and indirect cost of these programs be supported by permit fees established by the states.

The OAQ has worked closely with the U.S. EPA and other interested parties to develop model permit language to focus this review of individual applications on source-specific issues. During the last half of FY05 the OAQ modified its position on a number of frequently appealed conditions to improve the department's legal position and to make some conditions more practical for the permit holder. During the public review periods for initial draft Title V Permits, the OAQ worked with interested parties to further ensure that permits satisfy the requirements of the rules in a practical manner. Due to this modified position, OAQ was able to issue a significant number of initial Title V permits during the last part of FY06.

The **Federally Enforceable State Operation Permit (FESOP)** allows sources to limit their air emissions below the Title V threshold levels. A FESOP is somewhat less complex than a Title V permit and can provide more operational flexibility. Conditions in

a FESOP are enforceable by U.S.EPA as well as by IDEM. The OAQ has issued 763 FESOPs as of June 30, 2006 and 14 FESOPS during FY06.

The **Source Specific Operating Agreement (SSOA) Program**, established under 326 IAC 2-9, addresses specific types of sources that, if emissions were unlimited, would have a potential to emit (PTE) at thresholds greater than the major source thresholds for any criteria or hazardous air pollutants. However, the nature of the sources makes it possible to establish realistic operating conditions to limit the PTE to considerably less than major source thresholds. These conditions are specifically established by rule significantly streamlining the application, review, and approval process. The source categories in this program are:

- Surface Coating and Graphic Arts Operations
- Woodworking Operations
- Abrasive Cleaning Operations
- Grain Elevators
- Sand and Gravel Plants
- Crushed Stone Processing Plants
- Ready-Mix Concrete Batch Plants
- Coal Mines and Coal Preparation Plants
- Automobile Refinished Operations
- Degreasing Operations
- External Combustion Sources
- Internal Combustion Sources

Sources receiving an approval under 326 IAC 2-9 are exempt from the major operating permit program and are not required to submit a Title V or Federally Enforceable State Operating Permit (FESOP) application. OAQ has issued 843 SSOAs as of June 30, 2006, and 42 SSOAs during FY06.

The **Permit by Rule** program, established under 326 IAC 2-10, exempts certain very small sources from the requirement to obtain an operating approval due to the minimal amount of emissions generated by the source. These sources include all sources that have actual emissions less than 20% of the major source thresholds (without the use of emission controls) as established in 326 IAC 8-2-10. The Permit by Rule program also establishes, under 326 IAC 2-11, the following specific source categories:

- Gasoline Dispensing
- Grain Elevators
- Grain Processing or Milling

By rule, sources under the Permit by Rule Program are not required to submit an application, notify the OAQ or get an approval. These operations are required to produce ordinary business records upon the request of IDEM. IDEM can then verify that the source meets the requirements of the rules. Some sources do choose to notify and request an acknowledgement. During FY06, OAQ issued acknowledgment letters to the 16 sources that requested them.

OAQ has developed a **General FESOP for asphalt plants**, which has streamlined the approval process for these sources. The terms of the permit do not vary from source to source. The provisions of the General Permit were published in the Indiana Register and in at least one newspaper in every county to provide the public with an opportunity

to comment and request a public hearing. OAQ issued 11 General Asphalt permits to during FY06.

On December 25, 1998, rules became effective that essentially created a unitary permit system, in which only brand new sources will receive a Construction permit. All other types of modifications to existing sources receive an Amendment, Modification, or Revision to their existing Operating Permit. To most effectively implement federal requirements for sources that have a Title V permit, the OAQ issues separate permits for construction and operation. Permit Accountability, the requirement that approvals be issued within statutorily prescribed timeframes, still applies to agency permit actions in essentially the same manner as before.

The charts on the following pages show more detailed information on permit activity on:

**Operating Permit Programs**

First time Title V Operating Permits

Minor Operating Permits

Significant Modifications to Title V Operating Permits

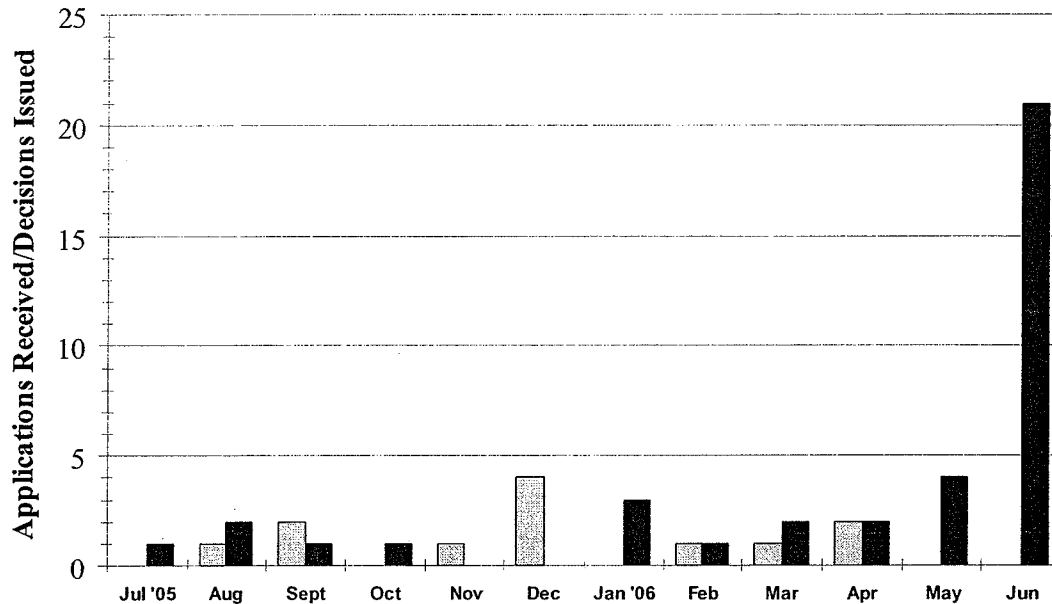
**New Source Review Program**

New Construction/Source Modifications

Federal Air Construction Permits

## First Time Title V Operating Permits

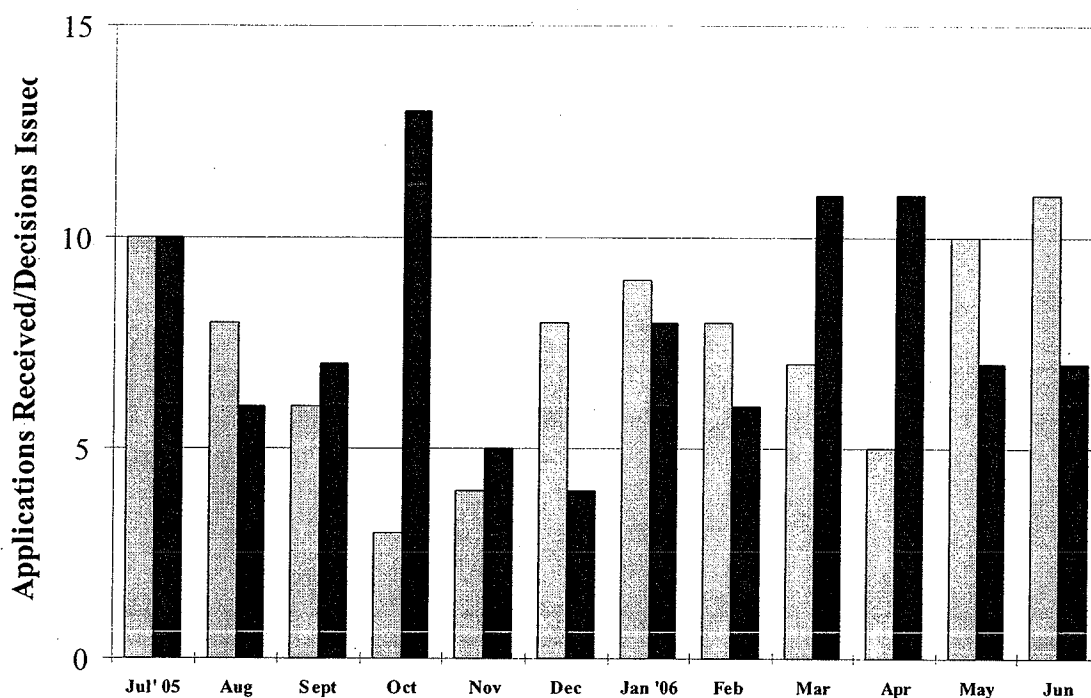
This chart represents first time Title V Operating permits only. The chart does not include those Title V applications received as part of a combined construction permit/operating permit approval, such as Title V/New Source Review, which are instead tracked as construction permits on page 8. The chart includes ALL permit decisions, including applications which were combined, withdrawn, or cancelled.



Applications	Jul '05	Aug	Sept	Oct	Nov	Dec	Jan '06	Feb	Mar	Apr	May	Jun	Total
Received	0	1	2	0	1	4	0	1	1	2	0	0	12
Final Decisions	1	2	1	1	0	0	3	1	2	2	4	21	38
Pending (not shown)	84	83	84	83	84	88	85	85	84	84	80	53	

## Minor Operating Permits

This chart shows Minor Source Operating Permits (MSOP), the Source Specific Operating Agreements (SSOAs), and Federally Enforceable State Operation Permits (FESOPs). The 1998 rules required existing minor sources without a valid permit to apply for an approval by December 27, 1999. Existing minor sources with operating permits were required to apply by December 26, 2000. The chart does not include those FESOP and MSOP applications received as part of a combined construction permit/operating permit approval, such as FESOP or MSOP with New Construction, which are tracked as construction permits (see page 8) Decisions include permits issued as well as applications withdrawn, combined or denied.



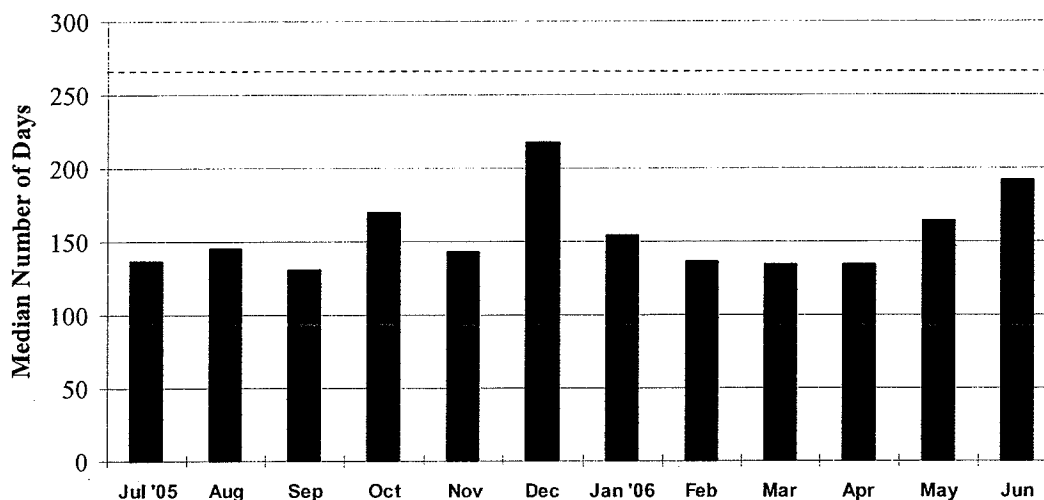
Applications	Jul '05	Aug	Sept	Oct	Nov	Dec	Jan '06	Feb	Mar	Apr	May	Jun	Total
Received	10	8	6	3	4	8	9	8	7	5	10	11	89
Final Decisions	10	6	7	13	5	4	8	6	11	11	7	7	95
Pending (not shown)	81	83	82	72	71	75	76	78	74	68	71	75	

Of the 95 minor source permit decisions made in FY06, 42 were Source Specific Operating Agreements (SSOAs) and 11 were General FESOPs for asphalt plants.



## Significant Modifications to Title V Operating Permits: 270 day deadline

This chart shows approvals for modifications to existing Title V permits. Approvals for modifications to existing sources with Title V permits is a two step process: source modification approval and permit modification approval. Pre-construction approvals for modifications to "sources" are tracked on page 8.

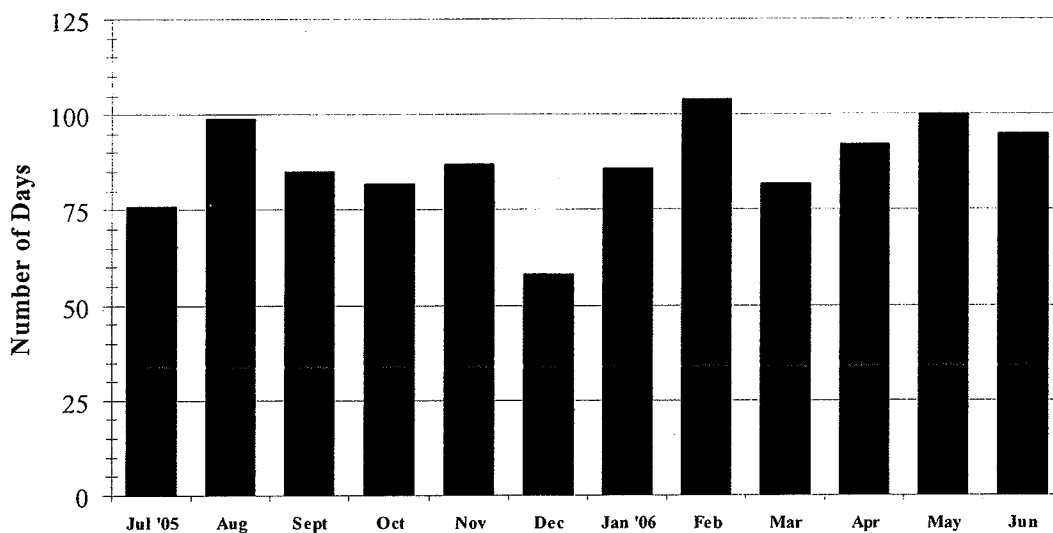


Applications	Jul '05	Aug	Sept	Oct	Nov	Dec	Jan '06	Feb	Mar	Apr	May	Jun	Total
Median # of Days to Issue	137	146	131	170	143	218	155	137	134	135	165	192	
#Past 270 Days*	0	1	0	0	1	2	0	1	1	0	1	1	9
Actual # Modifications Issued	4	12	8	6	10	4	7	18	21	16	10	14	130
Total Applications Received	35	7	10	12	31	26	9	12	23	26	10	10	211
Total Decisions	6	19	10	8	17	9	10	21	24	20	13	17	174
Total Applications Pending	106	94	94	98	112	129	128	119	118	124	121	114	

\* There is no statutory deadline for the approval of Title V significant permit modifications; instead 326 IAC 2-7-12(d)(2) states that IDEM shall complete review of the majority of significant permit modifications within nine (9) months after receipt of a complete application.

## New Construction/Source Modifications updated

The first table reports the number of permits **subject to the 120 day deadline** which were approved, and the median number of days it took to issue those permits, which also is depicted in the bar graph.



	Jul 05	Aug	Sep	Oct	Nov	Dec	Jan 06	Feb	Mar	Apr	May	Jun	Total
Median # of days to issue	76	99	85	82	87	58	86	104	82	92	100	95	
# of Permits past deadline	0	0	0	0	0	0	0	0	0	0	0	0	
# of permits approvals issued	10	8	10	9	10	5	17	9	12	11	5	9	115

The second table represents the total number of applications received, decisions issued, and applications pending for all levels of construction approvals, including: New Construction Permits, Interim Construction Permits, Exemptions, Registrations, applications for combined construction/operating permits (such as FESOP/NSR (Federally Enforceable State Operating Permit/New Source Review), as well as requests for modifications to existing sources, including modifications to Title V sources. Modifications to Title V permits are shown on page 7.

	Jul 05	Aug	Sep	Oct	Nov	Dec	Jan 06	Feb	Mar	Apr	May	Jun	Total
Total applications received	14	16	27	14	16	21	22	14	28	21	11	18	
Total final decisions	18	16	23	22	18	15	19	20	25	17	21	15	222
Total applications pending	113	113	117	109	107	113	116	110	113	117	107	110	229

## Major New Source Review: 270 Day Review

The OAQ issued the following permits submit to Federal Major Source Review rules in FY06 All permits subject to permit accountability were issued within the allowable time.

Applicant	County	Date
AK Steel Corporation	Spencer	8/5/06
University of Notre Dame	St. Joseph	8/24/05
Tate & Lyle, Sagamore	Tippecanoe	9/13/05
Essex Group	Knox	9/23/05
Knauf Insulation	Shelby	11/9/05
Steel Dynamics	Whitley	11/21/05
Fleetwood Motorhomes	Adams	12/22/05
Nucor Steel	Montgomery	4/27/06
Cincinnati Gas and Electric	Vermillion	5/17/06
Harrison Steel Castings	Fountain	5/19/06

The following information regarding permit activity is not shown on the preceding charts but is required by rule to be included in this report:

### Permit Application Increase/reduction

During FY06 the OAQ received a total of 1733 permit applications; (196 of the 1733 were reviewed by the Local Air Pollution Control Agencies.)

During FY05 the OAQ received a total of 1655 permit applications; (154 of the 1655 were reviewed by the Local Air Pollution Control Agencies.)

This represents an increase in workload of approximately 5 %.

### Public Hearings

The Office of Air Quality conducted 6 public hearings and the Vigo County Local Agency conducted one hearing during FY06. During this same period last year the OAQ conducted 8 public hearings.

### Appeals and Objections

Twenty-one approvals were appealed in FY06. Eleven approvals were issued to resolve air permit appeal cases in FY06 and three appeals were withdrawn or dismissed.

### Notices of Deficiency/Requests for Additional Information

During FY06, the OAQ issued 83 Administrative Notices of Deficiency (for information such as missing or incomplete forms) and 576 Technical Notices of Deficiency.

During FY05, the OAQ issued 71 Administrative Notices of Deficiency (for information such as missing or incomplete forms) and 357 Technical Notices of Deficiency.

## Financial Information

### Air Program Permit Fee Collections and Revenues Expenditures

IDEM expended \$5,684,065 in salary and benefits in FY06. This includes salary and benefits paid to Air Permit Branch staff and to staff supporting the Title V Program, such as our Compliance Branch. In addition, \$3,174,820 was spent on permit review contract assistance during FY06. Title V Operating Permit Program expenditures totaled \$12,204,498 in FY06. The OAQ collected \$10,715,061 in fees and \$196,722 in interest during FY06. No permit fees were refunded under 326 IAC 2-1.18(m) and (n) in FY06 because there were no late permit decisions. The Auditor's Cash Balance Report is provided below.

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT – TITLE V: 2760 FUND ANALYSIS REPORT AS OF JUNE 30, 2006

CASH BALANCE, 6/30/05	\$11,273,380
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**REVENUE:**

FEES	\$10,715,061
DED SHARE FED INDIRECT COST*	\$57,459
MISCELLANEOUS	\$1655
INTEREST	\$196,722
REVENUE: 7/1/05- 6/30/06	\$10,970,897

TOTAL REVENUE PLUS CASH BALANCE	\$22,244,277
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**EXPENSES:**

PERSONAL SERVICES	\$5,684,065
OTHER SERVICES	\$142,720
CONTRACT SERVICES	\$3,174,820
SUPPLIES	\$54,102
EQUIPMENT	\$151,046
MISCELLANEOUS	\$8,411
REV ADJ (PRIOR YEAR)	\$1500
DED TRF TO GENERAL FUND**	\$0
GRANTS	\$316,628
ADMIN SUPPORT	2,631,589
IN-STATE TRAVEL	\$24,426
OUT-OF-STATE TRAVEL	\$10,193
TOTAL EXPENSES 7/1/05-6/30/06	<u>\$12,204,498</u>

AUDITOR'S FUND BALANCE	\$10,039,799
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**OUTSTANDING OBLIGATIONS**

CONTRACT SERVICES	\$6,131,187
SUPPLIES	\$0
EQUIPMENT	\$44,516
GRANTS	\$96,302

TOTAL OUTSTANDING OBLIGATIONS	<u>\$6,272,005</u>
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AVAILABLE CASH BALANCE	<u>\$3,767,744</u>
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## Title V Fund Review

IDEM is required to review the balance of the trust fund as of July 1 and determine, once obligated funds are subtracted, whether the balance of the fund exceeds \$3,000,000. If that amount is exceeded, IDEM must adjust the fee payment schedule for the next billing cycle to return any excess trust fund monies. The IDEM Controller has conducted this review, furnished below, and has determined that the unobligated fund balance in the Title V fund was less than \$3,000,000 as of July 1, 2006.

Indiana Department of Environmental Management Analysis of Title V Cash Balance and Available Funds	
Fund Balance per Auditor of State 6/30/2006	\$10,039,779
Less Outstanding Obligations (Encumbrances at the Auditor of State)*	(\$70,677)
Less Estimated FY 07 Charges for Agency Wide Services	(\$2,633,351)
Less FY 06 fund balance needed to carry program until FY 07 fees are received	(\$7,883,156)
<b>Unobligated Fund Balance at 6/30/2006</b>	<b>(\$547,405)</b>
* Does not include \$6,131,187 in contractual liabilities as of 6/30/2006	
**Permits are not billed until the third quarter of the fiscal year. Therefore There must be sufficient funds at the beginning of the fiscal year to carry the operating center for at least ¾ of the fiscal period.	
***Transfer of dedicated funds to the general fund did not occur in FY06. This may or may not occur in FY 07. It will probably be dependent on whether a general fund deficit is anticipated at 6/30/07.	

**Description of any monies deposited into the Title V Operating Trust Fund that were obtained by means other than the fees paid under Title V**

Only fees collected from Title V, FESOP, and SSOA sources, and interest on these funds (plus interest) has been deposited into the Title V Operating Permit Trust Fund. No other monies have been deposited.

**Review of Fee Schedule and Adequacy of Fees Collected**

The Commissioner may adjust the fee schedule using the revision of the Consumer Price Index (CPI) which is most consistent with the CPI for calendar year 1995. The Commissioner may also adjust the fee schedule in the event that revenues do not total \$13,700,000. Revenues in FY06 did not total this amount.

When the Clean Air Act was established in 1990, the presumptive minimum fee was set at \$25 per ton. In 1994, when the Title V fee schedule was adopted by Indiana, it was based on a presumptive fee (based on a calculation of change in the CPI) of approximately \$27 per ton. In 2004, EPA adjusted the presumptive fee to \$37.43 per ton. Indiana's fees have not risen during this time.

After extensive consideration, IDEM's Office of Air Quality (OAQ) has concluded that in order to continue to provide quality permit service our Air Permit program, it has become necessary to request an increase in the annual operating fees. OAQ requests a 25% fee increase, which is approximately \$2.5 million annually.

In order to reduce the permits that are sent to permit review contractors, OAQ must first hire and train a significant number of additional staff to do work that is currently being done by contractors. OAQ anticipates that it will take approximately two years to hire and fully train the new staff required to review and write permits. During the transition period while new staff are being hired and trained, OAQ will be forced to continue to use permit review contractors in order to ensure quality and timely permit service. Approximately \$2 million of the requested increase would pay for the cost of hiring additional Air Permit staff so that OAQ can reduce reliance on outside permit review contractors.

Revenue has decreased while expenses have increased. In recent years, as emissions from Title V sources have decreased, the corresponding revenue from Title V fees has substantially decreased as well. Title 5 revenue has historically gone down approximately 2% per year. Re-designation of Lake and Porter Counties from severe to moderate non-attainment has decreased the fee cap, and several Title V sources have closed. Expenses related to staff have increased, in part due to the engineer salary differentials and general employee raises. In addition, operational expenses such as vehicles, copiers, supplies, and expenditures on contracts to enhance the Compliance and Permits databases, have also increased. Therefore, approximately \$.5 million of the requested increase would be to ensure that spending does not exceed revenue.

The next page shows a projection of the Title V Dedicated Fund account, as prepared by IDEM's Controller. If Title V fees are not raised, IDEM anticipates that the Title V fund would be depleted by FY09.

**Title V Dedicated Fund Projection**  
**Prepared September 22, 2006**

**Projected Expenses**

	<u>FY 07</u>	<u>FY 08</u>	<u>FY 09</u>
.1 Personnel Services	\$6,224,220	\$7,173,541	\$7,173,541
.2 Services Other Than Personnel	\$147,720	\$147,720	\$147,720
.3 Services By Contract	\$3,200,000	\$4,430,000	\$3,700,000
.4 Materials and Supplies	\$42,173	\$35,000	\$35,000
.5 Equipment	\$246,197	\$113,242	\$113,242
.7 Grants	\$465,000	\$433,858	\$433,858
.8 In-State Travel	\$30,000	\$30,000	\$30,000
.9 Out-of-State Travel	\$12,100	\$12,100	\$5,000
Total	<u>\$10,367,410</u>	<u>\$12,375,461</u>	<u>\$11,638,361</u>
 AWS Estimate	 <u>\$2,633,351</u>	 <u>\$2,100,000</u>	 <u>\$2,100,000</u>
 Grand Total	 <u><u>\$13,000,761</u></u>	 <u><u>\$14,475,461</u></u>	 <u><u>\$13,738,361</u></u>

**Biennial Budget**

	<u>FY 07</u>	<u>FY 08</u>	<u>FY 09</u>
.1 Personnel Services	\$7,069,818	\$7,265,027	\$7,265,027
.2 Services Other Than Personnel	\$147,720	\$147,720	\$147,720
.3 Services By Contract	\$3,200,000	\$3,730,000	\$799,351
.4 Materials and Supplies	\$42,173	\$35,000	\$35,000
.5 Equipment	\$246,197	\$113,242	\$113,242
.7 Grants	\$465,000	\$433,858	\$433,858
.8 In-State Travel	\$30,000	\$30,000	\$30,000
.9 Out-of-State Travel	\$12,100	\$12,100	\$5,000
Total	<u>\$11,213,008</u>	<u>\$11,766,947</u>	<u>\$8,829,198</u>
 AWS	 <u>\$2,633,351</u>	 <u>\$2,340,946</u>	 <u>\$2,071,159</u>
 Grand Total	 <u><u>\$13,846,359</u></u>	 <u><u>\$14,107,893</u></u>	 <u><u>\$10,900,357</u></u>

## Air Permits Program Improvements and Accomplishments during FY06

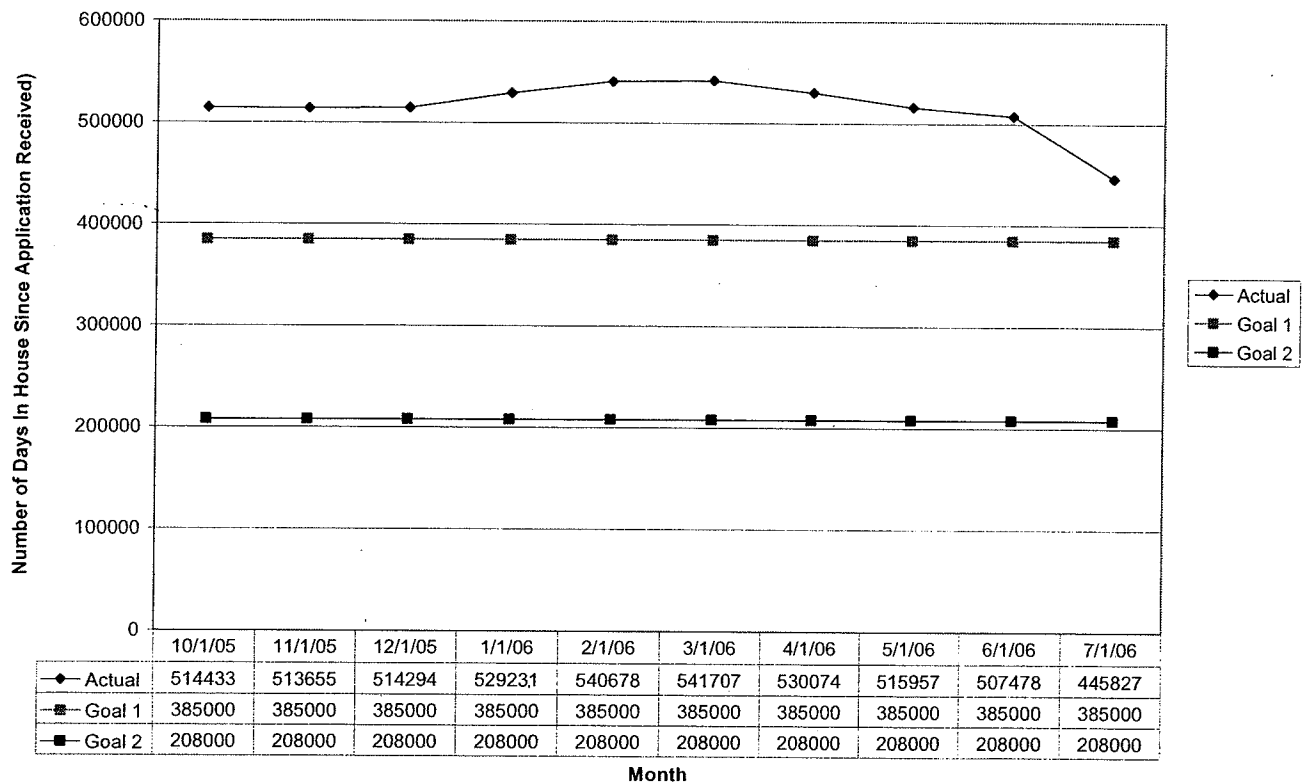
### Initial Title V issuance

- ▶ OAQ made significant progress in meeting our goals for issuing the initial Title V permits (applications received before 12/1/01.) During FY 06, OAQ issued 24 initial Title V permits. Of the remaining 32 initial Title V permits to be issued, only 3 had not gone to public notice as of June 30. All three of these permits have complex issues which have delayed their progress.

### Improvement in Metrics

- ▶ Last year IDEM began reporting on agency-wide performance metrics to Governor Daniels. The permit goal is to, on average, issue permits within their respective permit accountability deadlines on a calendar day rather than accountability clock day basis. As the chart below indicates, OAQ has made significant progress toward meeting Goal 1.

PERMIT METRICS: SUMMARY





#### Issuance of several high priority permits

- ▶ OAQ issued several high priority permits during FY06, including a modification to allow Subaru in Lafayette to significantly expand operations; New Source/Title V permit to Louis Dreyfus in Kosciusko County for a soy bean oil and biodiesel plant, and numerous permits for ethanol plants.

#### Clean Air Excellence Award:

- ▶ Dr. Trip Sinha received the EPA Clean Air Excellence Award for his work on the flexible TV/PSD permit for Eli Lilly in Tippecanoe County issued in 2004. Dr. Sinha was nominated for the award by Eli Lilly in appreciation of the high quality of the permit and the operational flexibility it provides them.

### **Priorities for the Air Permits Program for the next 12 months**

#### Reorganize Permits Branch, increase staffing, and reduce reliance on contractors

- ▶ OAQ plans to significantly reorganize the Branch in order to reduce reliance on permit contractors. Two new permit review sections have already been created, and the plan includes an additional two new permit review sections and additional senior staff to focus on training and staff development. OAQ is also considering adding permit staff at one of the Regional Offices.

#### Permit renewals

- ▶ OAQ has developed schedule to issue a large portion of the pending Title V, FESOP and MSOP renewals by December 31, 2006, and will be developing a schedule to issue the remainder.

#### Major economic development permits

- ▶ OAQ expects to issue a considerable number of major economic development permits. OAQ remains committed to rendering all permit decisions for new sources and modifications of existing sources as timely as possible without compromising public input.

#### Initial Title V Permit Issuance:

- ▶ OAQ will continue to devote a considerable amount of staff resources toward reviewing and issuing the remaining Title V permits.